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*ATTORNEYS FOR DEFENDANT SONY COMPUTER
 ENTERTAINMENT AMERICA, LLC*

ATTORNEYS FOR PLAINTIFF

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

DOUGLAS LADORE, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
 AMERICA, LLC, a Delaware limited
 liability company,

Defendant.

No. 3:14-CV-03530-EMC

**STIPULATION AND ~~[PROPOSED]~~
 ORDER EXTENDING DEADLINE TO
 RESPOND TO COMPLAINT AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE**

Hon. Edward M. Chen

[Local Rule 6-2]

Pursuant to Paragraph 4 of the Civil Standing Order for United States District Court
 Judge Edward M. Chen and Northern District Local Rule 6-2, Plaintiff Douglas Ladore

1 (“Plaintiff”) and Defendant Sony Computer Entertainment America, LLC (“Defendant”)
2 (collectively, the “Parties”) by and through their undersigned counsel, hereby respectfully
3 stipulate and agree, subject to Court approval, to extend Defendant’s deadline to respond to the
4 Complaint, and to continue the April 2, 2015 Case Management Conference, for twenty-eight
5 (28) days while they finalize their settlement agreement. In support of this Stipulation, the Parties
6 state as follows:

7 WHEREAS, on January 29, 2015, the Parties appeared for an Initial Case Management
8 Conference. At that time, the Court set a further Case Management Conference for March 10,
9 2015, with a case management statement due by March 3, 2015 (Dkt. 51);

10 WHEREAS, Defendant’s deadline to answer or otherwise respond to Plaintiff’s
11 Complaint is March 27, 2015 (Dkt. 53);

12 WHEREAS, on March 2, 2015, the Parties informed the Court of their agreement to
13 settle Plaintiff’s claims and requested that the Case Management Conference be continued while
14 the Parties negotiate and memorialize their agreement (Dkt. 54);

15 WHEREAS, the Court granted the Parties’ request and re-set the Case Management
16 Conference for April 2, 2015 (Dkt. 55);

17 WHEREAS, since that time, the Parties have continued to negotiate and finalize their
18 settlement and anticipate that they will be in a position to execute the agreement within, at most,
19 twenty-eight (28) days;

20 WHEREAS, because the settlement will result in dismissal of this lawsuit, a twenty-eight
21 (28) day extension of Defendant’s deadline to respond to the Complaint and continuance of the
22 Case Management Conference would conserve judicial and party resources;

23 NOW THEREFORE, the Parties hereby STIPULATE and AGREE as follows, subject to
24 Court approval:

25 1. Defendant shall have up to and including April 23, 2015 to answer or otherwise
26 respond to Plaintiff’s Complaint.
27
28

1 2. The Case Management Conference shall be continued by twenty-eight days to
2 April 23, 2015, or to such other date that is convenient for the Court.

3
4 Respectfully submitted,

5 EDELSON PC

6 Dated: March 25, 2015

By: /s/ Alicia E. Hwang

7 Alicia E. Hwang
8 Attorney for Plaintiff

9 SACKS, RICKETTS & CASE, LLP

10 Dated: March 25, 2015

By: /s/ Michele Floyd

11 Michele Floyd
12 Attorney for Defendant

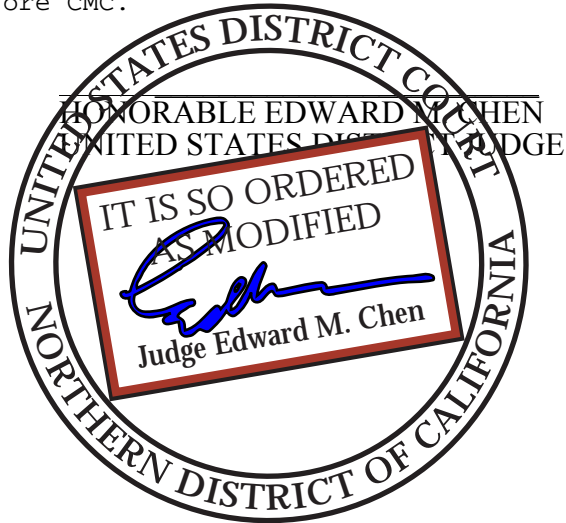
[~~PROPOSED~~ ORDER]

(1) PURSUANT TO STIPULATION, IT IS SO ORDERED.

Defendant shall have until April 23, 2015 to answer or otherwise respond to Plaintiff's Class Action Complaint.

The Case Management Conference scheduled for April 02, 2015 is hereby stricken and reset for May 28, 2015 at 10:30 a.m. No further continuances will be allowed. CMC statement due 7 days before CMC.

Dated: 3/26/15



ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: March 25, 2015

/s/ Alicia E. Hwang